

1. Defendants to respond fully to Plaintiffs' May 11 RFPs within two weeks of this Order;

3. Defendants to comply with the parties' agreed-to ESI protocol when producing documents, and if Defendants are unable to do so, the parties will choose a neutral, third-party vendor for collection and production, at Defendants' cost;

1

accounts exist, and (iii) he or she produced every responsive document to counsel via Dropbox or similar application so that Defendants' counsel can produce those documents in native format.

5. Plaintiffs are permitted to submit subsequently produced documents to the Court for review in connection with Plaintiffs' Motion for a Preliminary Injunction, and Defendants may not rebut or attempt to rebut the submission of such evidence;

6. Plaintiffs may re-depose Defendants based on information gleaned from subsequently produced documents, at Defendant's' costs; and

7. Defendants to pay \$5,415 in reasonable costs and fees in connection with the instant motion, as set forth in the accompanying Declaration of Max Bernstein.

IT IS SO ORDERED.

Dated: _____

Hon. Robert Pitman
United States District Judge